

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DANIEL A. LIND,)	CASE NO: 4:21-cv-02165
)	
Plaintiff,)	JUDGE: BENITA Y. PEARSON
)	
v.)	
)	<u>PLAINTIFF'S INITIAL</u>
NORTHEAST OHIO CORRECTIONAL,)	<u>DISCLOSURES</u>
et al.)	
)	
Defendants.)	
)	

RULE 26 DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1) Plaintiff, through the undersigned counsel, makes the following initial disclosures. These disclosures are based on information presently known and reasonably available to Plaintiff and which Plaintiff believes she may use in support of her claims. Continuing investigation and discovery will most likely cause Plaintiff to amend these initial disclosures, including by identifying other potential witnesses, documents, and by disclosing other pertinent information. Plaintiff, therefore, reserves the right to supplement these initial disclosures.

By providing these disclosures, Plaintiff does not represent that she is identifying every document, tangible thing or witness possibly relevant to her claims. In addition, these disclosures are made without Plaintiff waiving her right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures. Subject to the above qualifications and limitations Plaintiff provides the following disclosures:

(i) Individuals likely to have discoverable information

1. Daniel A. Lind
629 Oak Street
Medina, Ohio 44256
Plaintiff as to facts and damages.
2. Dale Lind
Family member as to facts and damages.
2. Andrea Reidy
Family friend as to damages.
3. Cindy Fredmonsky
Family friend as to damages.
4. Curt Slabaugh
Family friend as to damages.
5. Jeffrey Drogell
Family friend as to damages.
6. Johnny Sencs
Family friend as to damages.
7. Dian Lind
Family member as to damages.
8. Kyle Everett
Family member as to damages.
9. James Giovina, M.D.
Defendant as to underlying facts of case.
10. Marissa Hoppel, APRN
Defendant as to underlying facts of case.
11. Alexis Schnieder
Defendant as to underlying facts of case.
12. Nichol Davis, L.P.N.
Defendant as to underlying facts of case.
13. Dan A. Galita, M.D.
Cuyahoga County Medical Examiner
As to manner and cause of death of Dale Lind.

14. Representatives of Defendant Corecivic
As to records and documents of Corecivic pertaining to Dale Lind.
15. Amy Cross, L.P.N.
Corecivic nurse as to underlying facts
16. Megan A. Thomas, D.O.
Alteon Health
As to medical care provided to Dale Lind.

(ii) Documents in Plaintiffs' Possession

1. Medical Examiner documents including death certificate and autopsy of Dale Lind
2. Corecivic medical records regarding Dale Lind.
3. Photographs of Dale Lind and family.
4. Dale Lind letter from Corecivic sent to family postmarked 11/19/20.

(iii) Computation of damages

1. Wrongful death and survival claims to be determined.

Respectfully submitted,

/s/ John P. Colan

Thomas D. Robenalt (0055960)
John P. Colan (0081778)
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CERTIFICATE OF SERVICE

A copy of the foregoing will be sent to all parties of record via the Court's electronic filing system on this 2nd day of February 2022.

/s/ John P. Colan

THOMAS D. ROBENALT (#0055960)
JOHN COLAN (#0081778)
THE ROBENALT LAW FIRM, INC.

Attorneys for Plaintiff